

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

TRACEY WHITE, et al.,)	
)	
Plaintiffs)	
)	
v.)	Cause No. 14-cv-01490 - HEA
)	
THOMAS JACKSON, et al.,)	
)	
Defendants.)	

**ST. LOUIS COUNTY DEFENDANTS' MOTION TO COMPEL
DISCOVERY DIRECTED TO PLAINTIFFS KAI AND SANDY BOWERS**

COME NOW Defendants Jon Belmar, Sgt. David Ryan, P.O. Terence McCoy, P.O. Michael McCann, Det. Derik Jackson, Det. Aaron Vinson, Det. William Bates, Det. Nicholas Payne, P.O. Daniel Hill, P.O. Antonio Valentine, and St. Louis County, and pursuant to Rule 37(a)(1) of the Federal Rules of Civil Procedure, asks this Court to grant their Motion to Compel, and order Plaintiffs Kai Bowers and Sandy Bowers to Answer Defendants' First Interrogatories and First Request for Production of Documents. As grounds for their Motion, Defendants state as follows:

1. Defendants propounded their First Interrogatories and First Request for Production of Documents on Plaintiffs Kai Bowers and Sandy Bowers on July 23, 2015.
2. Plaintiffs have not responded to the discovery requests to date.
3. On August 21, 2015 Defendants' counsel had a conference call with all three of plaintiffs' attorneys to discuss a variety of discovery issues.
4. During the call, plaintiffs' counsel advised that they did not expect Kai or Sandy Bowers to timely respond to Defendants' First Interrogatories or First Request for Production of Documents, and consented to Defendants filing the instant Motion to Compel at this time.

5. Rule 37(a)(1) permits upon notice to others, a party to move for an order compelling disclosure.

WHEREFORE, for the above stated reasons, Defendants Jon Belmar, Sgt. David Ryan, P.O. Terence McCoy, P.O. Michael McCann, Det. Derik Jackson, Det. Aaron Vinson, Det. William Bates, Det. Nicholas Payne, P.O. Daniel Hill, P.O. Antonio Valentine, and St. Louis County ask this Court to grant their Motion to Compel, and order Plaintiffs Kai Bowers and Sandy Bowers to Answer Defendants' First Interrogatories and respond to Defendants' First Request for Production of Documents.

PETER J. KRANE
COUNTY COUNSELOR

/s/ Priscilla F. Gunn
Michael E. Hughes #23360MO
Associate County Counselor
Mhughes2@stlouisco.com
Priscilla F. Gunn #29729MO
Assistant County Counselor
Pgunn@stlouisco.com
41 S. Central, Ninth Floor
Clayton, MO 63105
(314) 615-7042
(314) 615-3732 (fax)

CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the foregoing was sent by the Court's electronic filing system to all attorneys of record this 1st day of September, 2015.

/s/ Priscilla F. Gunn